

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

DAVID SIDOO et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S MOTION TO DISMISS**

Pursuant to Federal Rule of Criminal Procedure 12(b)(3)(B), defendant John Wilson hereby moves the Court to dismiss Counts Six, Eight, Nine, Eleven, and Twelve of the Fourth Superseding Indictment. The grounds for this Motion are presented in Wilson's Consolidated Memorandum of Law in Support of His Motions to Sever, to Dismiss, and to Strike; in the exhibits attached to that memorandum; and in additional, separate memoranda that defendants are filing jointly. In essence, the counts in question are all legally deficient and factually impossible.

Respectfully submitted,

John Wilson,

By his Counsel,

/s/ Michael Kendall

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1**

I hereby certify that, before filing this motion, defense counsel attempted in good faith to confer with the government to resolve or narrow the issues.

/s/ Michael Kendall  
Michael Kendall

**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall  
Michael Kendall